



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

EC  
970201

Reply To  
Attn Of: ECO-088 July 11, 1997

Floyd J. Rogalski  
Team Leader  
Cle Elum Ranger District  
830 West Second  
Cle Elum, WA 98922

Re: Final Environmental Impact Statement for the Snoqualmie Pass  
Adaptive Management Area Plan

Dear Mr. Rogalski:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (EIS) for the Snoqualmie Pass Adaptive Management Area (AMA) Plan. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, which directs the EPA to review and comment publicly on the environmental impacts of Federal activities.

I appreciate the many opportunities your staff has made available for EPA to participate in the planning process of this land management approach. Please consider our comments to be one more opportunity for the continued cooperation between our agencies in this effort. I also appreciate the struggle your staff has faced in addressing these difficult issues inherent in this AMA. Perhaps in the future we could spend more time with your staff between the draft and final EIS to ensure all concerns are appropriately addressed.

We have reviewed the air quality discussions within the EIS and are satisfied that our previous concerns have been addressed. However, we still have considerable environmental concerns over the preferred alternative. EPA strongly encourages that Alternative 6 be adopted in the Record of Decision (ROD).

Our environmental concerns about the preferred alternative are based on the potential impacts of land management activities on surface water, aquatic resources, and habitat connectivity for wildlife migration. We are especially concerned that the preferred alternative still appears dependent upon land exchanges with private landowners in order for the alternative to accomplish the desired goals and objectives. In addition, we are concerned about the potential impacts to existing water quality limited/303(d)-listed streams in the AMA area, and on the Forests' abilities to effectively implement an adaptive management strategy under this AMA plan. EPA believes that the goals of this management plan should be consistent with the goals of the Northwest Forest Plan.

This Snoqualmie Pass area was chosen in the Northwest Forest Plan ROD to provide late successional habitat, and to demonstrate that connective links for wildlife migration can be accomplished, in an area with a checkerboard ownership pattern. EPA is concerned that unacceptable adverse effects will occur should the land exchanges mentioned in the alternative occur at less than the anticipated levels.

EPA does not consider the preferred alternative to be an environmentally acceptable alternative. Even if land exchange does occur, the preferred alternative doesn't adequately describe the management activities that will be implemented in the interim before any land exchanges occur. Furthermore, the current practices, believed to be those that will be in place in the interim, will not provide the environmental improvement that is anticipated under Alternative 6.

EPA believes that the AMA Plan is the appropriate level of planning and analysis to address the above potential environmental impacts resulting from the proposed management alternatives. Therefore, EPA urges that the AMA Plan include more in-depth monitoring of water quality related to sediment loading and temperature, and a stronger commitment toward possible adjustments of land management activities in response to monitoring results. Such inclusions into the Plan will improve any alternative chosen.

Alternative 6 is the most environmentally preferable alternative because it proposes a more cautious and innovative management approach. EPA believes such cautious management will




better provide water quality protection, and reduce impacts to soils, riparian areas, streams, and aquatic resources.

Alternative 6 will allow more opportunity to improve the water-quality impaired stream segments already occurring within the forests by drastically reducing sediment delivery to streams through the proposed reductions in road densities and lack of thinning. Additionally, this alternative provides the late-successional habitat and the critical migration connective links in the north-south movement of wildlife that are the emphasis of this AMA. Finally, Alternative 6 will provide opportunities for timber and forest products harvesting and recreation. EPA strongly encourages the adoption of this alternative in the Record of Decision.

We appreciate the opportunity to review and provide comments on this EIS. If you have any questions about our comments, please contact Steve Bubnick in our Geographic Implementation Unit at (206) 553-5171.

Sincerely,

  
For Richard B. Parkin, Manager  
Geographic Implementation Unit

cc: Sonny J. O'Neal, U.S. Forest Service (Wenatchee)  
Dennis E. Bschor, U.S. Forest Service (Mountlake Terrace)

# Summary Paragraph Form

ERP Number F-AFS-L65100-WA

RATING EC

COMMENTLTR

7/11/97

Name of EPA Official Responsible For Review Of Project (Principal Reviewer)

Steve Bubnick

Summary

*expressed*  
EPA's environmental concerns about the preferred alternative are based on the potential impacts of land management activities on surface water, aquatic resources, and habitat connectivity for wildlife mitigation.

*adverse*

Approved For Publication

(Initials of OFA  
Approving Official)

Note: Transmit 2 copies to MIU